

TELECOM BROADBAND SOLUTIONS, LLC

Enhanced Robocall Mitigation Program

FCC Compliance Reference: 47 CFR § 64.6305(d)-(f) | **FRN:** 0036898229 | **Filing**

Type: Voice Service Provider

1. Comprehensive Compliance Framework

1.1 Regulatory Alignment & Industry Leadership

TELECOM BROADBAND SOLUTIONS, LLC maintains a **gold-standard robocall mitigation program** that exceeds baseline FCC requirements through:

- **STIR/SHAKEN Implementation:** Full IP-network compliance (47 CFR § 64.6301(a)) with **A-level attestation** for verified calls.
- **Non-IP Network Mitigation:** Active participation in **ATIS Non-IP Call Authentication Task Force** to develop TDM solutions (per § 64.6305(d) extension).
- **Traceback Leadership:** 24/7 cooperation with **Industry Traceback Group (ITG)**, law enforcement, and FCC.

1.2 Threat Intelligence Integration

- **Real-Time Data Feeds:**
 - **FCC Robocall Mitigation Database (RMD)**
 - **USTelecom Threat Intelligence Platform**
 - **NEUSTAR FraudGuard Analytics**

2. Multi-Layered Mitigation Architecture

2.1 Advanced Call Authentication

Attestation Level	Application	Verification Protocol
Full A-Level	TELECOM BROADBAND SOLUTIONS, LLC-originated VoIP	STIR/SHAKEN + KYC validation

Attestation Level	Application	Verification Protocol
Partial B-Level	Partner networks	Limited attestation with analytics review
C-Level/Gray Route	High-risk jurisdictions	Blocked unless whitelisted

Technical Safeguards:

- **Tokenized Device Validation (TDR):** Mobile-originated call fingerprinting.
- **Non-IP Legacy Protections:**
 - DNO (Do Not Originate) list enforcement
 - Direct Inward Dial (DID) blocking

2.2 AI-Powered Traffic Defense

Real-Time Monitoring Stack:

1. **Behavioral Analytics Engine**
 - Detects:
 - Burst calling (>15K calls/hour)
 - Neighbor spoofing patterns
 - Call duration anomalies (<3 sec)
2. **Geofencing System**
 - Blocks calls from:
 - High-fraud countries
 - Unallocated numbering blocks
3. **Reputation Scoring**
 - 0-100 risk rating (auto-block >90)

Third-Party Integrations:

- **First Orion CallPrint®** for scam labeling
- **TNS Call Guardian** for robocall fingerprinting

2.3 Surgical Call Blocking

Tiered Mitigation Protocol:

Risk Tier	Action	Example Triggers
Critical (Tier 1)	Immediate hard block	DNO-listed, "Invalid" STIR/SHAKEN
High (Tier 2)	30-min delayed termination	CNAM mismatch, rapid call cycling
Medium (Tier 3)	Audio CAPTCHA challenge	New customer spikes

3. Ironclad Network Security

3.1 Fraud Prevention Regimen

Customer Vetting (KYC/KYP):

- Enterprise Clients:
 - EIN/Tax ID validation
 - Business license verification
 - 6-month call pattern audit

Upstream Provider Requirements:

- Mandatory RMD registration
- Contractual traceback cooperation clauses
- Monthly traffic integrity reports

3.2 Law Enforcement Collaboration

- Dedicated 24/7 Traceback Team:
 - Secure portal for FCC/ITG requests
 - SLA: 12-hour response time
- Subpoena Compliance:
 - Legal hold procedures
 - Chain-of-custody documentation

4. Proactive Industry Engagement

4.1 Consumer Protection Initiatives

- **Free Call Protection Suite:**
 - Network-level blocking
 - Spam labeling (STIR/SHAKEN display)
 - "Verified Caller" badge program
- **Education Campaigns:**
 - FCC DNC registry enrollment drives
 - Deepfake voice scam awareness

4.2 Standards Development

- **ATIS/SIP Forum Working Groups**
- **RFC Contributions** on non-IP authentication
- **USTelecom Robocall Task Force** leadership

5. Executive Certification & Contacts

Officer Attestation:

"TELECOM BROADBAND SOLUTIONS, LLC certifies under penalty of perjury that this program implements all feasible measures to prevent illegal robocall traffic, including STIR/SHAKEN where technologically possible. We maintain zero tolerance for non-compliance and authorize immediate service termination for violators."

Dedicated Anti-Robocall Units:

Function	Contact	Availability
Mitigation Operations	mikeraynott@telecombroadbandsolutions.com	24/7/365
Legal/Subpoenas	mikeraynott@telecombroadbandsolutions.com	Business hours + emergency
Regulatory Filings	mikeraynott@telecombroadbandsolutions.com	Mon-Fri 8am- 6pm ET